UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION

STEVEN GILLMAN, as Personal Representative for the ESTATE OF MEGAN ANN MILLER, Deceased,

Plaintiff,

Case No. 21-12762

-VS-

HON. MARK A. GOLDSMITH

CITY OF TROY and JULIE GREEN-HERNANDEZ,

Defendants.

AYANNA D. HATCHETT (70055) VEN R. JOHNSON (P39219) JOHNSON LAW, PLC 535 Griswold Street, Suite 2600

Detroit, MI 48226 (313) 324-8300

ahatchett@venjohnsonlaw.com

LORI GRIGG BLUHM (P46908)

City Attorney

JULIE QUINLAN DUFRAINE (P59000)

Asst. City of Attorney Attorneys for City of Troy 500 W. Big Beaver Road Troy, MI 48083

248-524-3320

MARGARET T. DEBLER (P43905) HOLLY S. BATTERSBY (P72023) MICHAEL T. BERGER (P77143) Attorneys for Defendant Hernandez 27555 Executive Drive, #250

Farmington Hills, MI 48331

(313) 489-4100

mdebler@rsjalaw.com hbattersby@rsjalaw.com mberger@rsjalaw.com

<u>DEFENDANT GREEN-HERNANDEZ'S EX PARTE MOTION FOR</u>
<u>LEAVE TO FILE EXHIBTIS VIA MEDIA UPLOAD</u>

The undersigned attorney for Julie Green-Hernandez, pursuant to the Electronic Filing Policies and Procedures seeks leave of this Court to file an exhibit via the electronic portal "Media File Upload" in CM/ECF.

The exhibits, which are attached to her Motion for Summary Judgment (ECF 40) are identified as:

- Ex. 12 Morrow Dash Cam
- Ex. 13 1# PDLU Sallyport Fixed
- Ex. 14 3# PDLU Booking Vestibule
- Ex. 15 7# PDLU Booking Camera
- Ex. 16 Video Schuler Interview
- Ex. 23 6-19-2020 Video Noon-2p
- Ex. 28 7-19-2020 Video 2p-4p
- Ex. 29 20-18508_LU CALLS

Those exhibits are video or audio files which cannot be converted to PDF.

For the foregoing reason, the undersigned respectfully requests that this Court grant the leave sought in this motion.

Respectfully submitted,

ROSATI SCHULTZ JOPPICH & AMTSBUECHLER PC

s/ Michael T. Berger

Attorney for Defendant Hernandez 27555 Executive Drive, Ste. 250 Farmington Hills, MI 48331 (248) 489-4100 mberger@rsjalaw.com (P77143)

DATED: February 17, 2023

CERTIFICATE OF SERVICE

I hereby certify that on February 17, 2023, I electronically filed the foregoing paper with the Clerk of the Court using the ECF system, which will send notification of such filing to the following: All counsel of record.

ROSATI SCHULTZ JOPPICH & AMTSBUECHLER PC

s/ Michael T. Berger

Attorney for Defendant Hernandez 27555 Executive Drive, Ste. 250 Farmington Hills, MI 48331 (248) 489-4100 mberger@rsjalaw.com P77143